

DISCLAIMER

This electronic version of an SCC order is for informational purposes only and is not an official document of the Commission. An official copy may be obtained from the [Clerk of the Commission, Document Control Center](#).

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

AT RICHMOND, JUNE 5, 2002

COMMONWEALTH OF VIRGINIA, ex rel.

STATE CORPORATION COMMISSION

CASE NO. PUC-2001-00206

Ex Parte: Establishment of
Carrier Performance Standards
for Verizon Virginia Inc.

ORDER APPROVING REVISIONS TO
VA GUIDELINES FILED FEBRUARY 22, 2002

On February 22, 2002, Verizon Virginia Inc. ("Verizon Virginia") filed with the State Corporation Commission ("Commission") its proposed revisions and comments to the Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports ("VA Guidelines"), which reflect the New York consensus and non-consensus metric changes adopted by the New York Public Service Commission ("NYPSC") (hereafter, "February 22, 2002, Proposed VA Guidelines").¹

¹ On January 4, 2002, the Commission issued an Order Establishing Carrier Performance Standards with Implementation Schedule and Ongoing Procedure to Change Metrics ("January 4, 2002, Order"). A copy of Verizon Virginia's February 22, 2002, Proposed VA Guidelines is available at: <http://www.state.va.us/scc/division/PUC/cc:momfiles/collab225.pdf>

Effective April 9, 2002, the new Case Management System requires that the case number format for all Commission orders change from, e.g., PUE010663 to the following: PUE-2001-00663.

On March 22, 2002, the Commission issued a Procedural Order on Proposed Revisions to VA Guidelines Filed February 22, 2002 ("Procedural Order"), requesting comments and/or requests for hearing. On April 11, 2002, WorldCom, Inc. ("WorldCom"), Metro Teleconnect Companies, Inc. ("Metro"), AT&T Communications of Virginia, LLC ("AT&T"), and Verizon Virginia filed Comments. On April 26, 2002, Reply Comments were filed by AT&T, WorldCom, and Verizon Virginia. No party requested a hearing.

The Procedural Order determined that the non-objectionable metric changes to the VA Guidelines would be considered approved 60 days after filing unless otherwise ordered by the Commission. It was noted in the Procedural Order that Verizon Virginia objected to the non-consensus metric revisions adopted by the NYPSC,² identified as Metrics OR-10-01, OR-10-02, and OR-4-11. Therefore, the Commission determined that these specific metric changes could not be considered for approval under the 60 days procedure.

Consistent with the Commission's ongoing procedure to revise the VA Guidelines we find that the changes in the February 22, 2002, Proposed VA Guidelines, except for Metrics

² *Proceeding on Motion of the Commission to review Service Quality Standards for Telephone Companies, Order Modifying Existing and Establishing Additional Inter-Carrier Service Quality Guidelines, NYPSC, Case 97-C-0139 (10/29/01) ("NYPSC Order").*

OR-10-01, OR-10-02, and OR-4-11, are hereby considered approved effective April 23, 2002.³

Verizon Virginia has proposed that the February 22, 2002, Proposed VA Guidelines be implemented on the third calendar month after the month in which the Commission approves the revisions. No party objected to this proposed implementation schedule. The Commission finds that Verizon Virginia's proposed implementation schedule should be approved.⁴

Metrics OR-10-01 and OR-10-02 are new performance metrics adopted in the NYPSC Order, and both measure the timeliness of Verizon Virginia's resolution of Purchase Order Number ("PON") electronic notifier exceptions. Verizon Virginia opposes adopting these two metrics as being not needed in Virginia because of the relatively low incidence of PON notifier exceptions. Alternatively, Verizon Virginia proposes to lengthen the resolution intervals so that Metric OR-10-01 would have a standard of 95% in 9 business days, and Metric OR-10-02 would have a standard of 99% in 30 business days.

³ Metro's comments appeared to request changes to the VA Guidelines outside the scope of this filing; and, therefore, the Commission does not consider that there were formal objections to any other proposed metric changes.

⁴ Under the approved implementation schedule the non-objectionable metric revisions should be implemented no later than the third calendar month following April 2002, or July 2002. The implementation schedule date for the objectionable metrics will be tied to the date of this Order.

Both AT&T and WorldCom state that Metrics OR-10-01 and OR-10-02 should be approved as adopted by the NYPSC.⁵ AT&T and WorldCom comment that PON notifiers are important tools for competitive local exchange carriers ("CLEC") to use to keep their customers informed regarding the expected service date. If a PON notifier is not received by the CLEC and the related trouble ticket not resolved quickly, the delivery of the customer's service can be impacted.

The Commission notes that Metric OR-10-01 was adopted by the NYPSC with a view toward revisiting the 95% standard if the number of PON notifier exceptions continues to decline in New York. However, we find that for the present time, Metrics OR-10-01 and OR-10-02 should be approved as adopted in the NYPSC Order. If these metrics or their interval standards are subsequently changed in New York, this Commission will evaluate any such subsequent metric changes as part of our procedure for considering ongoing changes.⁶

Verizon Virginia also objects to adopting revised Metric OR-4-11, which measures whether Verizon Virginia has failed to

⁵ As adopted by the NYPSC Order, Metric OR-10-01 calls for a standard of 95% for resolving PON notifier exceptions in 3 business days, and Metric OR-10-02 has a standard of 99% of PON notifier exceptions resolved in 10 business days.

⁶ However, neither Verizon Virginia nor any other interested party is precluded from seeking changes or revisions to these metrics or any others in the VA Guidelines if circumstances warrant, whether or not the NYPSC has approved those changes.

send both a Provisioning Completion Notice ("PCN") and a Billing Completion Notice ("BCN") for a CLEC order. The standard adopted in the NYPSC Order is that not more than 0.25% of electronic PONs received neither a PCN nor a BCN within 2 business days from the Service Order Processor ("SOP") posting of the provisioning of the last service order associated with a specific PON.

In its Comments, Verizon Virginia states that as a practical matter Metric OR-4-11 duplicates OR-4-16. Furthermore, Verizon Virginia contends that Metric OR-4-11 was adopted in New York based on the assumption that the BCN and PCN were provided as independent operations. However, under its Virginia system, expresSTRAK, Verizon Virginia states it does not issue a BCN unless a PCN has been issued. Verizon Virginia therefore objects to Metric OR-4-11 because it does not issue a BCN unless a PCN is issued, and a metric measuring a failure to send both is in reality a measurement of its failure to send the PCN. Alternatively, Verizon Virginia requests that if Metric OR-4-11 is adopted, the standard should be no more than 1% with a 3-business day interval.

Both AT&T and WorldCom state that Metric OR-4-11 should be adopted and comment that receiving both the PCN and BCN are critically important to CLECs in providing service to customers. While a CLEC may be able to work around an order with the PCN or

BCN missing, both would be a critical matter to a CLEC. AT&T and WorldCom also express concern that Verizon Virginia's expressTRAK system does not produce a PCN and BCN independently. This scenario may actually increase the risk to the CLEC that no notifier will be received. AT&T also points out that at present expressTRAK is not the sole SOP in Virginia.⁷

The Commission finds that both the PCN and BCN are critical notifiers to the CLECs. The Commission finds that Metric OR-4-11 should be approved as adopted in the NYPSC Order.

Accordingly, IT IS ORDERED THAT:

(1) All non-objectionable metric revisions filed by Verizon Virginia in this case on February 22, 2002, are approved, effective April 23, 2002, consistent with the findings above.

(2) Metrics OR-10-01 and OR-10-02 are hereby approved as adopted in the NYPSC Order consistent with the findings above.

(3) Metric OR-11-04 is hereby approved as adopted in the NYPSC Order consistent with the findings above.

(4) Verizon Virginia's proposed implementation schedule is hereby approved consistent with the findings above.

(5) This case is now continued.

⁷ Verizon Virginia also uses the SOAC system. The differences in these two systems were recognized in the Commission's January 4, 2002, Order. In that Order the Commission required two metrics to be treated as if SOAC is no longer in place after July 1, 2002, but did not require the actual retirement of SOAC.